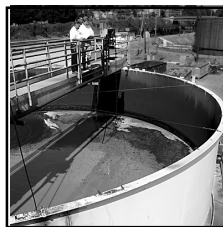


Industrial Pretreatment Quarterly

Published for Industrial Dischargers by the King County Industrial Waste Program



Volume XXI Issue 3 Sept. 2002

Mission Statement

The mission of the Industrial Waste Program is to protect the environment, public health, biosolids quality, and King County's regional sewerage system. We work cooperatively with our customers as we regulate industrial discharges, provide technical assistance, and monitor the regional sewerage system.

Industrial Waste Advisory Committee

Charles Cuniff,
Environmental Coalition of South Seattle
Ken Gross, GM Nameplate, Inc.
Mike Jeffers, Envirotech Systems
Sandy Hallberg, Askco Processing, Inc.
Donna Hoskins, Berlex Laboratories, Inc.
Tom Raymond, Honeywell, Inc.
Steve Skodje, Cargill, Inc.
Doris S. Turner, Boeing Commercial
Airplane Group - Renton
Chris VanHoof, City of Kent

The King County Industrial Waste Program salutes the 2001 Winners of the Rewards and Recognition Program

EnviroVation Award

Boeing Commercial Airplane Group -
Renton

Commitment-to-Compliance Award

Boeing Commercial Airplane Group -
North Field (Seattle)
Bunge Foods (Seattle)
Burlington Northern/Santa Fe Railroad
Company (Seattle)
Crane-Eldec Corporation -
Martha Lake Facility (Bothell)
Seattle Public Utilities -
Kent Highlands Landfill

Burlington Northern-Santa Fe Railroad Company (Seattle) 2001 Commitment-to-Compliance Award Winner



(Left to right) BNSF's Jennifer Anderson, Manager of Environmental Operations and Don Reiling, Supervisor of Environmental Operations receive the Commitment-to-Compliance Award from KCIW Program Manager Elsie Hulsizer.

The Burlington Northern-Santa Fe Railroad (BNSF) Seattle facility's record of successful

compliance culminated in a 2001 King County Industrial Waste (KCIW) Commitment-to-Compliance Award.

The award, given to only four other facilities in 2001, honors those that have received a Gold Certificate for five consecutive years. (To win a KCIW Gold Certificate, a permitted King County facility must have discharged wastewater during a minimum of six months of the calendar year from at least one of its sites and have no violations of any kind.)

Located in Seattle's Interbay area, the locomotive fueling and maintenance facility has spent two and one-half million dollars to upgrade its pretreatment system. The upgrade included a new oil/water separator, increased stormwater storage, a new dissolved air floatation (DAF) unit (used to remove petroleum oil) and a new effluent storage tank. The tank lends additional surge capacity to mitigate peak flow conditions during high rain periods.

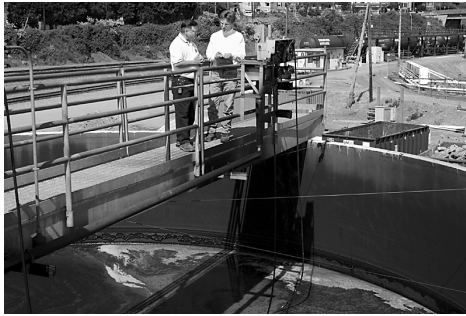
The Industrial Waste Program congratulates BNSF (Seattle) on its excellent compliance record!

September 2002 Issue Contents:

- Burlington Northern-Santa Fe Railroad Company (Seattle) 2001 Commitment-to-Compliance Award Winner
- KCIW News Briefs
- Industrial Pretreatment Tips
- King County Responds to Proposed MP&M Rule
- Component Agencies Update
- June IWAC Meeting
- Publication of Recent Enforcement Actions

Issues of this newsletter are posted and archived at <http://dnr.metrokc.gov/wlr/indwaste/publicat.htm>.





BNSF's Don Reiling (left) and KCIW Investigator Jeff Bowman view a surge tank used prior to treatment.



Don Reiling using the BNSF computer system that monitors all aspects of the Interbay treatment plant.

KCIW News Briefs

Fees will be charged for Letters of Authorization

Starting in January 2003, the King County Industrial Waste Program (KCIW) will charge a fee for processing and issuing Letters of Authorization. The amount of the fee will be determined by early November 2002 and will be posted on KCIW's web site <http://dnr.metrokc.gov/wlr/indwaste/fees.htm>. At the present time KCIW only charges fees for permits and discharge authorizations. Letters of Authorization are issued for temporary discharges such as construction dewatering or for very low volume discharges.

Envirovation Award Nominations for 2002

KCIW gives the Envirovation Award to facilities that:

- Voluntarily implement an innovative pollution prevention strategy,
- Significantly update their pretreatment equipment or methods,
- Significantly reduce the amount of wastes being discharged to King County, or
- Significantly reduce their water use.

To nominate facilities that have achieved any of these goals during the 2002 calendar year, please submit a letter to KCIW describing the facility's achievement in detail by January 31, 2003 (Facilities may self-nominate.) Please limit descriptions to three pages. KCIW staff will review all nominations. Winners will be announced in Spring 2003.

IWAC News

The King County Industrial Waste Program's Industrial Waste Advisory Committee (IWAC) welcomes new members Sandy Hallberg, Environmental Manager, Asko Processing, Inc. and Chris VanHoof, Private Storm Inspector, City of Kent.

Upcoming IWAC meetings were scheduled for September 11 and December 4, 2002 at 9:00 a.m.

The meeting site is wheelchair accessible.



People who have needs or disabilities for which arrangements must be made ahead of time should get in touch with the Industrial Waste Program. (For sign language interpreter requests, please contact us at least two weeks before this event.) Call (206) 263-3000 (voice) or the Washington Relay Service at 1-800-833-6388 or e-mail kristin.painter@metrokc.gov.

Gold Award

A. O. Smith Water Products Company (Renton)
 Alaskan Copper Works (Seattle)
 Arco Products Company - Seattle Terminal (Seattle)
 Avtech Corporation (Seattle)
 B.S.B. Diversified Company (Kent)
 Boeing Commercial Airplane Group - North Field (Seattle)
 Boeing Commercial Airplane Group - Plant II Facility (Tukwila)
 Boeing Commercial Airplane Group - Renton
 Boeing Information, Aircraft & Missile Systems - Renton Electronics Center (Renton)
 Bunge Foods (Seattle)
 Burlington Northern/Santa Fe Railroad Company (Seattle)
 Carl Zapffe, Inc. (Seattle)
 Carnitech US, Inc. (Seattle)
 Circuit Partners, Inc. (Issaquah)
 Circuit Services Worldwide LLC (Bellevue)
 Coal Creek Development Corp. - Landmarc Technologies (Newcastle)
 Crane-Eldec Corporation - Martha Lake Facility (Lynnwood)
 Crane-Eldec Corporation - North Creek Facility (Bothell)
 Davis Wire Corporation (Kent)
 Emerald Pharmaceutical (Seattle)
 Flow International Corporation (Kent)
 Foss Maritime Company (Seattle)
 General Dynamics OTS Aerospace, Inc. (Redmond)
 Genie Industries - Z45 Plant, Bldg. 5 (Redmond)
 GM Nameplate, Inc. (Seattle)
 Green Garden Food Products, Inc. (Kent)
 Hytek Finishes Company (Kent)
 I-90 Express Finishing (Redmond)
 IFCO Systems (Seattle)
 Industrial Plating Corporation (Seattle)
 Interstate Brands Corporation - Hostess (Seattle)
 Island Spring, Inc. (Vashon Island)
 Kenworth Truck Company - Renton
 King County CIP - South Interceptor Parallel Phase III (Tukwila)
 King County CIP - Swamp Creek (Kenmore)
 Magnetic & Penetrant Services Co., Inc. (Seattle)
 Marco Shipyard Seattle, Inc. (Seattle)
 Mastercraft Metal Finishing, Inc. (Seattle)

Oberto Sausage Company - Airport Way (Seattle)
 Precor USA - Plant I (Woodinville)
 Precor USA - Plant II (Woodinville)
 Quala Systems (Kent)
 Quality Finishing, Inc. (Kirkland)
 Rabanco Recycling (Seattle)
 Safeway, Inc. - Beverage Plant (Bellevue)
 Seattle Barrel Company (Seattle)
 Seattle Solid Waste -
 Kent Highlands Landfill (Kent)
 Silicon Designs, Inc. (Issaquah)
 Skills, Inc. - (Auburn)
 Smith Fabrication, Inc. (Kent)
 Time Oil Company (Seattle)
 Universal Brass, Inc. (Auburn)
 Universal Sheet Metal, Inc. (Woodinville)
 Vectra Fitness (Redmond)
 Western Pneumatic Tube Company (Kirkland)
 Willamette Industries (Bellevue)

Silver Award

ATL Ultrasound (Bothell)
 Ball Metal Beverage Container Corporation (Kent)
 Baker Commodities, Inc. (Tukwila)
 Boeing Aircraft & Missile Systems - (Kent)
 Burlington Environmental - Kent
 Cedar Grove Composting, Inc. (Maple Valley)
 Emerald Petroleum Services (Seattle)
 Fuji TruColor (Kent)
 Genie Industries - Bldgs. 3 & 4 (Redmond)
 Genie Industries - Moosewerks Plant, Bldg. (Redmond)
 Immunex Corporation - (Bothell)
 King County Solid Waste - Cedar Hills Landfill (Maple Valley)
 Northstar Beverage (Kent)
 Oberto Sausage Company - (Kent)
 Pacific Propeller (Kent)
 Pepsi-Cola Company (Seattle)
 Philip Environmental Corporation - Georgetown (Seattle)
 Photoworks Manufacturing, Inc (Seattle)
 Puget Sound Energy, Inc. (Kent)
 Siemens Medical Solutions, Inc. (Issaquah)
 Surftech Finishes Company, Inc. (Kent)
 TTM Technologies, Inc. (Redmond)
 Western Metal Arts (Kent)
 Western Processing Trust Fund II (Kent)
 WestFarm Foods – (Issaquah)

Industrial Pretreatment Tips

FYI: Access Industrial Waste Program Forms on the Internet:

The Industrial Waste Program's Wastewater Discharge Permit Application and Discharge Permit Application Instructions as well as other forms and materials are downloadable from the program's Web pages at <http://dnr.metrokc.gov/wlr/indwaste/forms.htm>.

The King County Industrial Waste Program (KCIW) will split compliance samples with facilities:

Did you know that the King County Industrial Waste Program (KCIW) provides facilities it monitors the opportunity to share a portion of the compliance samples it collects?

The potential benefits of this procedure to facilities are:

This procedure offers the opportunity for facilities to compare analyses, which also provides facilities with a double check on the accuracy of their analysis.

Analyzing split samples:

Some facilities opt to have their own laboratory (or contract laboratory) analyze the split samples. Alternatively, facilities may elect to have the sample analyzed only if the analysis of KCIW's portion of the split sample shows a violation of the regulated parameters in the permit.

Environmental Protection Agency (EPA) regulation covering split samples:

It will probably not surprise anyone there is a federal regulation covering this situation. A subparagraph of the EPA's "General Pretreatment Regulations" (40 CFR 403) states the following:

"If an Industrial User (IU) subject to the reporting requirement in paragraph (e) of this section [paragraph (e) referring to here is titled "*Periodic reports on continuing compliance*" and is applicable to all facilities that submit data to KCIW] monitors any pollutant more frequently than required by the Control Authority [in this case KCIW], using the procedures prescribed in paragraph (g)(4) of this section [this means the facility uses an approved analytical method], the results of this monitoring shall be included in the report."

What all of this means is that if facilities analyze a split sample using an approved method, then the data shall be submitted to KCIW. As well, facilities doing split sampling must follow applicable sample preservation procedures if they intend to have the sample analyzed. Facilities should ask the KCIW specialist collecting the sample for preservation guidance.*

Submitting the data:

Facilities do not have to submit the data for any sample where an unapproved analytical method is used. In other words, if they employ a spot check, test with a Hach Kit, or use a similar shortcut, the data does not have to be submitted. Normally this data would be submitted as part of facilities' monthly self-monitoring reports.

***Note:** All data submitted by IU's, including the data from split samples, would be averaged with KCIW data in determining whether a company is in significant noncompliance.

Any more questions?

Facilities with any questions on these requirements should contact the KCIW investigator or specialist they work with or call KCIW's main number at (206) 263-3000.

King County Responds to Proposed MP&M Rule

Introduction:

The Industrial Waste Program's (KCIW's) June 2002 *Pretreatment Quarterly* included an article concerning a notice given by the Environmental Protection Agency (EPA) of its intention to finalize effluent limitations and guidelines for the Metal Products and Machinery (MP&M) Point Source Category in December 2002. (Published in the May 21, 2002 *Federal Register*.) The EPA's intention is to finalize effluent limitations and guidelines for the Metal Products and Machinery (MP&M) Point Source Category in December 2002.

As part of the MP&M rule development process, the EPA published a Notice of Data Availability (NODA) in the June 5, 2002 *Federal Register*. The NODA included a solicitation by the EPA for answers to 26 questions to assist it in finalizing the proposed rules.

In addition, the Association of Metropolitan Sewerage Agencies (AMSA), an association of large sewerage agencies, solicited responses to several additional questions concerning the proposed regulations.

Because these proposed regulations potentially affect a significant number of dischargers in King County, KCIW responded to selected questions of both EPA and AMSA, addressing those questions that KCIW believes to be of most concern to this agency and the affected facilities. The following excerpts those responses.

KCIW continues to emphasize its stance there is no need for the MP&M regulations. It is KCIW's conviction that the existing combination of local and federal limits provides sufficient protection for the environment.

(Note: The editors indicate below when readers can find an expanded explanation on the Internet at <http://dnr.metrokc.gov/wlr/indwaste/publicat.htm>. Please note that the entire article is reprinted in the expanded version. This article includes only KCIW's responses to the EPA on the most substantive issues. To order a copy of KCIW's complete response, please call the KCIW office at (206) 263-3000.)

EPA's new rules & KCIW's comments excerpted from the "Solicitation of Comment" section of KCIW's response the NODA:

1) Zinc Platers. EPA proposes to develop a special set of regulations specifically for zinc platers.

KCIW response: KCIW sees no compelling reason to establish a separate subcategory for zinc platers, contending that the existing regulations for electroplating (40 CFR 413) and metal finishing (40 CFR 433), or "413/433," and King County local limits adequately regulate zinc. Reduction of the zinc limit from the current 413/433 levels will have no significant impact on the

zinc load reaching the county's treatment plants while costing at least \$76,000 per year to process violations.

Instead of promulgating additional subcategories for zinc, KCIW suggests that the EPA set limits for zinc for all members of each subcategory at an achievable level for zinc platers operating Best Available Technology (BAT) systems.

4) Molybdenum Removals. EPA proposed regulations include limits for molybdenum and questioned the treatment technologies required to meet the limits for this pollutant.

KCIW response: As an example of the molybdenum precipitation difficulties raised by the EPA, one area company with a Pretreatment Standard for New Sources-Centralized Waste Treatment facility has been unable to meet the standard even though it is using BAT technology.

KCIW's analysis of treatment plant influent load vs. MP&M loading contributions shows that molybdenum is the only metal that could be significantly reduced by the proposed MP&M levels. Unfortunately, the lack of adequate BAT for this metal makes implementation of the new level problematic. Accordingly, KCIW encourages the EPA not to regulate molybdenum until a decision is made on the round two 503 biosolids regulations: *The Standards for the Use or Disposal of Sewage Sludge (AD CFR Part 503)*. KCIW does not believe that EPA should count the incidental removal of molybdenum as an environmental benefit. The amount removed is dependant upon the specific conditions at those companies sampled and cannot be reliably extrapolated to the MP&M metal bearing subcategories.

8) Regulate Low Concentration Facilities: The question concerns facilities that presently do not need to employ pretreatment to meet the electroplating or metal finishing standards.

KCIW Response: The facilities cited do not contribute significant pollutant levels or loadings and their regulation, as a categorical discharger, does not benefit the environment. **KCIW recommends that facilities whose only regulated process is cleaning, non-zinc phosphating or similar non-metal contributing process, be excluded not only from MP&M, but also any other categorical standard.** Alternately, the cleaning operations should be placed in the oil subcategory and the low volume dischargers should be excluded due to volume.

Sixteen of the county's fifty-eight 413/433 companies (23%) produce low concentration waste without treatment. About 5% of these companies produce waste without significant metals because they only discharge from alkaline degreasing and non-zinc phosphating. The others are low volume dischargers who control their waste with Best Management Practices such as dead rinses and counter current rinses. The metal loading from

the alkaline degreasing and iron phosphating operations should be set at zero for the pollutant loading analysis since they rarely have metal concentrations that exceed the Method Detection Limit. Using the *Part 433* long term averages or the *Part 433* monthly averages would probably overestimate the loading from the low volume companies that introduce metals since few discharge all the currently regulated metals. In any case, due to their low volume, the total loading is negligible and should not be considered when calculating pollutant reductions.

9) Monitoring Costs. The EPA estimates it will cost agencies \$13,400 to monitor each facility that would be added as a result of proposed regulation.

KCIW Response: If publicly-owned treatment works (POTW's) were required to monitor dischargers twice a year for semi-volatiles to verify compliance with the total organic parameters (TOP) limit, *the county's monitoring costs would be increased by \$1130 per company.* Without clarification on several issues it is not possible to estimate total additional monitoring costs. As well, KCIW cannot assess whether the EPA estimate of \$13,400 per facility for monitoring for pollutants not already regulated is reasonable.

KCIW needs clarification on these analytical issues:

- For organics, will the 162/1625 isotope methods be required if the QA/QC procedures in this method are applied to the 625/624 method?
- Will EPA allow method detection limits (MDL's) to be between one and five times less the limit instead of always five times less?
- Will the inductively coupled plasma mass spectrometer (ICPMS) method be formally approved so that it can be used for compliance analyses?

EPA estimates for administrative costs of the MP&M proposal are also underestimates because they include only permitting and monitoring costs, not the costs of identifying potential facilities that may be subject to the regulation.

KCIW is also concerned with increased analytical costs for the total organic parameters (TOP), tin, and low-level zinc. King County's costs estimates show that costs used in the *Economic, Environmental, and Benefits Analysis for the Proposed Metal Products & Machinery Rule* are an order of magnitude less than KCIW would encounter in regulating this industrial sector.

20) No Regulation Options. The EPA solicited comments concerning the potential adoption of an option that would not impose additional regulations on metal finishing job shops, printed wiring board facilities, the general metal category, zinc platers and the steel forming and finishing subcategory.

KCIW Response: King County supports the "no further regulation" option. It opposes including currently non-categorical facilities in *Part 433*.

KCIW's analysis shows that, except for molybdenum, additional regulation of existing permittees would not significantly reduce the pollutant load at KCIW's treatment plants. Identifying currently unregulated and low volume MP&M companies would require a significant effort. Secondly, the daily maximums in KCIW's local limits for metals are as strict as the *Part 433* limits, except for zinc, silver and cyanide. **Review of historical data showed that no more than 3% of the metals samples exceeded the *Part 433* monthly average limits.** (If the EPA adopted a no further regulation policy, all of KCIW's permittees would still be subject to KCIW's local limits, so such a change would not cause additional metal loading of KCIW's system.)

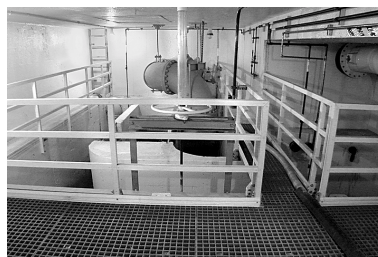
KCIW currently regulates twelve *Part 413* companies. Three of these companies are zero dischargers. Of the remaining nine, only two are permitted as *413* < 10,000 gallons per day.

In lieu of pretreatment standards KCIW would encourage the use of a voluntary pollution prevention (P2) alternative for job shops. King County's nationally recognized Local Hazardous Waste Program has active outreach to machine shops and auto maintenance facilities. KCIW believes that education and collaboration with these businesses will significantly reduce pollutant loading to KCIW's treatment plants. The program suggests that this method is a more effective and efficient use of KCIW's ratepayers' money than the command and control approach envisioned by the proposed MP&M regulations.

In summary: KCIW would like to see such outreach programs accepted as an alternative to local implementation of MP&M regulations. If the EPA's proposed *40CFR438* rule is adopted, KCIW requests that the EPA eliminate requirements for sampling for parameters that have been shown not to be present and remove dischargers of less than 3 million gallons per year from categorical status.

AMSA Comments:

AMSA requested comments on three questions. The first concerned EPA's potential "no further regulation" option. That topic was fully covered above, and AMSA's other two questions are addressed in an expanded version of this article at <http://dnr.metrokc.gov/wlr/indwaste/publicat.htm>.



This information is available in alternative formats on request at (206) 263-3000 (voice) or 711 (TTY).

Component Agencies Update

Brightwater Conveyance Location Under Study

While local media have focused on the location options for the new Brightwater treatment plant, less coverage has afforded to the topic of conveyance. KCIW thought that this topic would be of interest to its component agencies.

Introduction:

*The new sewage-treatment plant (Brightwater) must be up and running by 2010 to accommodate growth in north King and south Snohomish counties. With the preferred location of the "Route 9" site announced in August, the draft Environmental Impact Statement is scheduled to be released in fall, 2002. The environmental review will examine the two sites equally: a 53-acre waterfront site in Edmonds, in King County (the **Unocal site**) and a 111-acre site near Woodinville off Route 9 in unincorporated Snohomish County (the **Route 9 site**). Based on the environmental review results, the county's preferred site might not end up being the final one.*

The following is an excerpt from the King County Internet site at <http://dnr.metrokc.gov/wtd/brightwater/>. These pages contain a great deal of information about this project.

Description of Conveyance Locations Under Consideration for Brightwater

A number of alternative pipeline corridors and alternative portal and pump station siting areas are being considered during the scoping period. King County is continuing to evaluate the engineering feasibility of the alternative conveyance corridors.

As the result of this engineering evaluation, the number of alternative corridor, portal, and pump station locations to be considered in the Environmental Impact Statement (EIS) may be fewer than those listed here. Decisions on which alternatives to build will depend on the analyses in the EIS, on technical feasibility analyses conducted during the design process, on comments from the community, and on other considerations.

For the **Unocal site**, the following alternatives are being considered during the scoping period:

- Four influent corridors (three deep-tunnel and one near-surface)
- Seventeen portal and pump station siting areas
- Two alternative outfall zones in Puget Sound

For the **Route 9 site**, the following alternatives are being considered during the scoping period:

- One deep-tunnel influent corridor
- Six effluent corridors (four deep-tunnel and two near-surface)

- Thirty-four portal and pump station siting areas
- Three alternative outfall zones in Puget Sound

A pipeline corridor is a 1,000-foot-wide band of land that shows the general pathway that a conveyance pipeline may follow. The corridors are much wider than the utility easement that will eventually be required for pipeline construction and maintenance. Identifying a wider area allows for the flexibility to accommodate site-specific conditions when selecting specific pipeline locations within a corridor.

The corridors for each system are named by (1) the treatment plant site that they will serve, (2) the general location of the corridor, and (3) the predominant method that will be used to construct the pipes in that corridor—either the cut-and-cover ("near-surface") or tunnel boring ("deep-tunnel") method.

Two corridors may follow the same pathway but may be labeled as two different corridors because the pipes will be constructed differently. For example, the "Unocal South Corridor—Deep Tunnel" and the "Unocal South Corridor—Near Surface" follow the same general pathway.

The pipelines that will be needed for the Brightwater system will depend on whether the Unocal or the Route 9 treatment plant site is selected.

● **If the Route 9 site is selected**, both an influent and an effluent pipeline will be required—one to carry untreated wastewater from King County's existing pipelines in the Lake Forest Park area through Kenmore and Bothell to the Route 9 site and one to carry treated wastewater from the Route 9 site to the outfall.

● **If the Unocal site is selected**, only an influent pipeline will be required to carry untreated wastewater from King County's existing pipelines near SR 405 in Bothell through Kenmore and Lake Forest Park to Edmonds. Both the Unocal and Route 9 sites will require an outfall into Puget Sound.

The need for portals and pump stations will depend on a number of factors, including where and how the pipelines are installed. Each alternative portal siting area is 2,000 feet in diameter (about 70 acres). However, portals and pump stations will require only 1 to 2 acres within each of these areas. Once corridors are selected, the process for determining specific locations for portals and pump stations will begin.

Publication of recent enforcement actions

This publication displays those companies that were the subject of enforcement actions during the period of June 2002 through July 2002 (or have not been previously published) and their violations met one or more of the following criteria:

- Were found in significant noncompliance during the reporting period;
- Received fines; or
- Had violations that were unique or warrant special attention.

(Continued on next page)

Companies Found with Significant Noncompliance

Company	Nature of Violation/Type of Pollutant	Basis for Significant Noncompliance	Penalty	Comments
Art Brass Plating 5516 Third Avenue Seattle, WA 98108	Cyanide	Art Brass Plating violated the technical review criteria that is greater than 33 percent of the measured concentrations of cyanide were in excess of the standard by a factor of 1.2 times the limit.	Compliance schedule and post-violation charge.	Art Brass Plating has upgraded many aspects of its cyanide treatment system and is back in compliance with its waste discharge permit.
Fuji Trucolor 770 Andover Park E. Tukwila, WA 98188	Late Report	Fuji Trucolor failed to submit the application for renewal of its waste discharge permit within 30 days of the due date.	Notice of violation.	Fuji Trucolor filed its application; no further action was taken.
Quala Systems 19929-77 th Avenue S. Kent, WA 98032	Permit violation-discharge of pollutant that can cause interference or pass-through and failure to accurately report noncompliance.	Failure to accurately report noncompliance.	\$1,143.63 fine, compliance schedule, and post-violation charge.	In response to the violation, Quala Systems will (1) post a notice of emergency contact information in highly visible location, (2) create a permit information file available to all employees, and (3) provide training to all employees on permit compliance.

Companies receiving fines

Company	Nature of Violation/Type of Pollutant	Penalty	Comments
Da Vinci Gourmet, Ltd. 7224 First Avenue S. Seattle, WA 98108	Failure to complete the installment of a pretreatment system by the established deadline.	\$1,575 fine, compliance order and post-violation charge.	Da Vinci Gourmet encountered unexpected problems with the installation of its pretreatment system and is proceeding with completion of the installation.
El Paso Production Production Company 27525 Covington Way Maple Valley, WA 98107	Code violation-Discharging beyond expiration date of authorization and without written approval from King County.	\$450 fine and post-violation charge.	El Paso Production Company immediately ceased discharge and completed the process for discharge authorization. Discharges from this site have been in compliance with King County discharge limits.
Mikron Industries 1034 Sixth Avenue N. Kent, WA 98032	Code violation-Knowingly falsifying, tampering with, or knowingly rendering inaccurate any report required pursuant to the federal pretreatment standards.	\$1,600 fine, post-violation charge and compliance schedule.	Mikron Industries voluntarily notified King County of the violation and cooperated with the investigation. It took immediate steps to get back into compliance. Mikron will perform a third party audit of its waste-water compliance management system.

In addition to the above actions King County Industrial Waste also issued enforcement actions for the following violations:
copper (1); late report (1).

June IWAC Meeting Featured Honeywell Pretreatment System Tour

King County Industrial Waste Program's (KCIW's) Industrial Advisory Committee (IWAC) held its June 6 meeting at Honeywell International Inc.'s operation in Redmond. Tom Raymond, Honeywell Environmental Engineer and IWAC member, offered a presentation and tour through portions of the Honeywell campus and the new pretreatment system, explaining the various processes involved in planning, designing, and constructing the system. Thanks again, Tom!


For more information about KCIW's IWAC Committee, go to the <http://dnr.metrokc.gov/wlr/indwaste/news.htm> or see KCIW contact information on front page; "KCIW News Briefs" in this issue.



IWAC committee briefing in Honeywell Learning Center.



*IWAC committee tours
Honeywell pretreatment plant.*

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